

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA DIVISION**

In Re: JOSEPH M. FLOOD III Debtor(s) VELOCITY COMMERCIAL CAPITAL, LLC, A CALIFORNIA LIMITED LIABILITY COMPANY Movant v. JOSEPH M. FLOOD III Debtor(s) BERNADETTE FERRELL Co-Debtor KENNETH E. WEST Trustee Respondent(s)	Chapter 13 Case Number: 25-12221-amc
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**NOTICE OF MOTION, RESPONSE DEADLINE
AND HEARING DATE**

Velocity Commercial Capital, LLC, a California Limited Liability Company has filed with the Court a Motion for Relief from the Automatic Stay under 11 USC §362(d) and §1301 in order to proceed with its rights under non-bankruptcy law with regard to the Property, located at 1501 North 2nd Street, Unit 10, Philadelphia, PA 19122-3846.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before July 17, 2025, you or your attorney must do all of the following:

(a) file an answer explaining your position with the Clerk's Office located at:

Clerk of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

In Philadelphia:

900 Market Street, Suite 400
Philadelphia, PA 19107-4299

In Reading:

U.S. Bankruptcy Court, Clerks Office
The Gateway Building
201 Penn Street, Suite 103
Reading, PA 19601

If you mail your answer to the Clerk's Office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to movant's attorney:

Steven P. Kelly, Esquire
Stern & Eisenberg, PC
1581 Main Street, Suite 200
The Shops at Valley Square
Warrington, PA 18976
Telephone: (215) 572-8111
Facsimile: (215) 572-5025
skelly@sterneisenberg.com

and to the Trustee: Kenneth E. West
Ch. 13 Trustee
190 N. Independence Mall West
Suite 701
Philadelphia, PA 19106

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in this motion.
3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on August 5, 2025 at 11:00 a.m. in Courtroom Number 4, United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse, 900 Market Street, Philadelphia, PA 19107.
4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).

5. You may contact the Bankruptcy Clerk's office for Philadelphia cases at (215) 408-2800 and for Reading cases at (610) 208-5040 to find out whether the hearing has been canceled because no one filed an answer.

STERN & EISENBERG, PC

By: /s/ Steven P. Kelly

Steven P. Kelly, Esquire

1581 Main Street, Suite 200

The Shops at Valley Square

Warrington, PA 18976

Phone: (215) 572-8111

Fax: (215) 572-5025

Bar Number: 308573

Email: djskellyones@sterneisenberg.com

Date: July 3, 2025